

REMARKS/ARGUMENTS

Claims 2-15 remain in the subject application. Claims 2, 3, 11 and 15 are amended, as recited hereinabove.

Claims 2-15 have been rejected under 35 U.S.C. 102(e) as being allegedly anticipated by Hasbun et al. (5,586,285). Claims 2, 3 and 11, as amended hereinabove, and claim 15 are believed to be patentable over Hasbun et al. It is therefore also believed that all claims depending therefrom are necessarily patentable over Hasbun et al. Reconsideration and allowance of claims 2-15 is hereby respectfully requested.

Hasbun et al. do not disclose “one or more blocks being identified by a group of logical block addresses”, as does the claimed invention”. Additionally, unlike Hasbun et al., the claimed invention teaches “writing data for the one or more sectors of data to be rewritten to one or more new blocks identified by same group of logical block addresses without moving the data ...”

In Hasbun et al., there is no apparent discussion of such grouping of blocks vis-a-vis writing or rewriting of sectors of data, there is simply a discussion on writing a compressed sector without regard to the management of blocks, as claimed in the present invention. It is believed that such block management of the present invention improves overall system performance in a way unknown to Hasbun et al.

That is, by way of example, in Hasbun et al., after a sector is written to a block, the next sector(s) to be written, if different than those already written, are written to another block. Then, if the sector that was already written thereto, in the same block, is rewritten by the host, it will be written to the same block only if there is enough free memory to accommodate the sector(s). Writing of additional sectors generally results in writing to other blocks that have enough free locations to accommodate the additional sectors. Consequently, there is a scattering of the sectors that are written thereto by the host, throughout memory, such that ultimately and prior to erasure or clean-up of blocks, the sectors are re-grouped or organized, which results in the copying of, for example, the sector that was rewritten to an original block to another location. In fact, a search is done of all “good” sectors and then

these "good" sectors are collected or gathered and then copied to other blocks. [See Hasbun et al.: Cols. 15-17

In the claimed invention however, such copying or moving is avoided, as recited by "without moving the data in the sectors in said ..." as well as the "one or more blocks being identified by a group of logical block addresses". That is, the group of logical block addresses, which cause identification of the block within which one or more sectors are written thereto, correspond to a predetermined group of sectors and if these sectors are rewritten, another block is used to store the rewritten data, thus, there is no need to move information from the block that contained the first write of sectors. [See Specification: Page 19, lines 20-30 and Estakhri et al., U.S. Patent No. 5,845,313, at col. 7, lines 50-52 of which the subject application is a continuation-in-part.] Additionally, writing of other sectors is done to other blocks, without consideration of whether or not the sector fits in the particular block, as done by Hasbun et al. which when coupled with avoiding moving or copying also avoids scattering of sectors, as in Hasbun et al.


Lastly, the present invention, as claimed, rewrites sectors, whereas, Hasbun et al. write a compressed sector.

Accordingly, it is submitted that independent claims 1, 3, 11 and 15 are patentable over Hasbun et al. Additionally, all claims depending therefrom are also necessarily patentable over Hasbun et al.

Reconsideration and allowance of claims 1-15 is hereby respectfully requested. Applicants submit that the subject application is now in condition for allowance and an early notice thereof is respectfully requested. Should any further amendment be required prior to passing the application to issue, the Examiner is respectfully invited to contact the undersigned by telephone at the number set out below.

Respectfully submitted,
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